

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

DAVID BLACK.

Petitioner,

v.

CHADWICK DOTSON,

Respondent.

Civil Action No. 1:21-cv-472 PTG-WBP

**MOTION FOR LEAVE TO CONDUCT DISCOVERY
AND FOR A COURT ORDER TO OBTAIN DOCUMENTS**

Petitioner David Black, by and through undersigned counsel, respectfully requests that the Court grant Petitioner leave to conduct discovery pursuant to 28 U.S.C. § 2554(e)(2) and Rule 6(a) of the Rules Governing 28 U.S.C. § 2554 Cases in the above matter. Simultaneous with the filing of this Motion, Counsel has filed a Motion to Seal the Motion for Discovery, the required non-confidential supporting documentation, the LCvR 5(C) Notice, and the proposed sealed (unredacted) document. Pursuant to Chapter 8 of this Court's E-Filing Policies and Procedural Manual – Filing Documents that Require Leave of the Court – a redacted version of Petitioner's Motion for Discovery is attached.

DATED THIS 3rd day of May, 2024.

Respectfully submitted,

/s/ David Benowitz

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CERTIFICATE OF SERVICE

I hereby certify that on this 3rd day of May 2024, a copy of the foregoing motion has been electronically served on the parties in this case via the Court's CM/ECF system.

_____/s/_____
David Benowitz